

In re: KIMBERLY C. SUTTER, : **Case No. 16-62301**

Debtor. : **Chapter 7**

7708 Bowman St. Rd. : **JUDGE KENDIG**
Plymouth, Ohio 44865
xxx-xx-2149 :

Now comes Debtor, by and through counsel, and hereby respectfully represents the following to the Court:

- Permanent Parcel: 0270406817000

5. The property is subject to the following liens listed in order of their respective priorities:
 - a. Jody Lykins (Judgment Lien) In the Amount of \$18,550.92 plus interest and costs.
6. The value of the property as obtained from the Richland County Auditor is \$11,530.00.
7. The Debtor has claimed an exemption in her interest of the property, pursuant to Ohio Revised Code 2329.66(A)(18). No objections were filed to said exemption. The existence of the creditor Jody Lykins's lien on the Debtor's interest in her real estate impairs exemptions that she is entitled to under 11 U.S.C. Section 522(b) and Ohio Revised Code 2329.66.
8. Debtor has attached hereto and incorporated herein documentation supporting the foregoing allegations.

WHEREFORE, Debtor respectfully prays this Honorable Court for an Order for the cancellation and avoidance of the Judgment Lien described above, and for such other and further relief as this Court deems just and proper.

Respectfully submitted.

/s/ David C. Badnell

David C. Badnell (0063841)
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Attorney for Debtor

20A NOTICE

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult with one).

If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion filed, then on or before **December 31, 2020** you or your attorney must file a written Objection and a written Request for a Hearing with Clerk of the U.S. Bankruptcy Court, Ralph Regula Federal Building & United States Courthouse, 401 McKinley Avenue S.W., Canton, Ohio 44702. If you mail your request to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above. You must also mail a copy to Attorney David C. Badnell, 21 North Walnut Street, Mansfield, Ohio 44902 and the Case Trustee at the address listed below.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting that relief.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Motion to Avoid Lien was electronically transmitted this 10th day of December, 2020, via the Court's CM/ECF system to the following, who are listed on the Court's Electronic Mail Notice List:

Josiah L. Mason, Trustee jlmasontrustee@joemasonlaw.com; oh23@ecfcbis.com

United States Trustee (Registered address)@usdoj.gov

and by Certified Mail this 10th day of December, 2020, to:

Jody Lykins
193 2nd Street Extension
Shelby, Ohio 44875

and by Regular U.S. Mail this 10th day of December, 2020, to:

James L. Blunt, II, Esq.
105 Sturges Avenue
Mansfield, Ohio 44903

Kimberly C. Sutter
7708 Bowman St. Rd.
Plymouth, Ohio 44865

/s/ David C. Badnell
David C. Badnell (0063841)
Attorney for Debtor